

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

<b>ANAS ELHADY, et al.,</b>	)	
	)	
Plaintiffs,	)	<b>Case No. 16-cv-00375</b>
	)	<b>Hon. Anthony J. Trenga</b>
	)	<b>Hon. Mag. John F. Anderson</b>
	)	
v.	)	
	)	
<b>CHARLES H. KABLE</b> , Director of the	)	
Terrorist Screening Center; in his official	)	
capacity, <i>et al.</i> ;	)	
	)	
Defendants.	)	

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**PLAINTIFFS' MOTION TO COMPEL RE: PRIVATE DISSEMINATION**

Pursuant to Fed R. Civ. P 37(a)(3)(B) and E.D. Va. L.R. 37, Plaintiffs hereby move to compel additional information regarding the extent of Defendants' private dissemination of TSDB information. Per the January 4, 2019 order of the Court (Dkt. 258), as extended (Dkt. 260), Defendants were required to provide supplemental information regarding private dissemination by February 8, 2019. Defendants' supplemental response provided on that date is deficient.

Pursuant to Federal Rule of Civil Procedure 26(c)(1), Plaintiffs' counsel certifies the parties have met and conferred in good faith, but have not been able to reach agreement as to the requested information. As of February 14, 2019, Defendants' counsel has indicated they oppose the motion, although there are some discrete portions of information requested which they are working to see whether they will be able to supplement within the next week.

Respectfully submitted,

COUNCIL ON AMERICAN-ISLAMIC  
RELATIONS

BY: /s/ Gadeir Abbas  
LENA F. MASRI (DC 1000019) (pro hac vice)  
GADEIR I. ABBAS (VA 81161)\*  
CAROLYN M. HOMER (DC 1049145) (pro hac vice)  
*Attorneys for Plaintiffs*  
453 New Jersey Ave, SE  
Washington, DC 20003  
Phone: (202) 742-6420

*\*Gadeir Abbas is licensed in VA, not in D.C. Practice  
limited to federal matters.*

AKEEL & VALENTINE, PLLC  
SHEREEF H. AKEEL (P54345)  
888 W. Big Beaver Rd., Ste. 910  
Troy, MI 48084  
Phone: (248) 269-9595  
shereef@akeelvalentine.com

Dated: February 15, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that on February 15, 2019, I electronically filed the foregoing by using the Court's ECF system. I further certify that all participants in the case are registered ECF users and will be electronically served by the Court's ECF notification system.

Respectfully submitted,

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AKEEL & VALENTINE, PLLC

BY: /s/ Shereef Akeel  
SHEREEF H. AKEEL (P54345)  
*Attorney for Plaintiffs*  
888 W. Big Beaver Rd., Ste. 910  
Troy, MI 48084  
Phone: (248) 269-9595  
shereef@akeelvalentine.com